



M O S K O W I T Z & B O O K , L L P

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February 20, 2019

**VIA ECF and
FIRST CLASS MAIL**

Hon. Deborah A. Batts
United States District Court for the
Southern District of New York
United States Courthouse
500 Pearl Street, Rm. 2510
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 2/26/2019

Re: *L & Leung Leatherware Limited v. Collection XIIX Ltd. and Lisa Nunziata*,
No. 1:17-cv-07374-DAB

Dear Judge Batts:

We represent defendant/third-party plaintiff Lisa Nunziata and defendant/counterclaim plaintiff Collection XIIX Ltd. in the above-referenced action. We write on behalf of all counsel to request the Court's approval of a further 45-day extension of the discovery end-date and the rescheduling of other remaining pre-trial deadlines originally set forth in the Court's scheduling order dated April 12, 2018 (ECF Doc. 30), as detailed below.

Most recently, on January 3, 2019, the Court so-ordered the parties' joint December 20, 2018 letter request to extend by 60 days the discovery end-date (to February 26, 2019) and other pre-trial deadlines herein (ECF Doc. 37, a copy of which we attach).

Since that Order, defendants have conducted depositions of three fact witnesses (all foreign nationals), the parties have diligently exchanged additional document discovery, including financial information relevant to plaintiff's damages claim, and discussions regarding appropriate expert discovery have been had.

Defendants have an outstanding February 1, 2019 supplemental request for documents related to plaintiff's expert's preliminary damages analysis. To accommodate plaintiff's response to that request, and expert discovery, including depositions, we respectfully request a further extension of the discovery end-date (from February 26, 2019) and all current remaining pre-trial deadlines set forth originally in the Court's April 12, 2018 scheduling order, as follows:

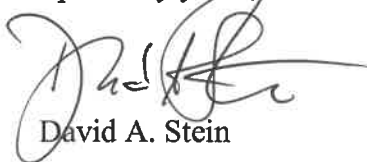
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- Discovery Deadline: 4/12/2019
- Deadline to Notify Regarding Dispositive Motion: 5/13/2019
- Proposed Requests to Charge and Proposed Voir Dire Due: 7/8/2019
- Joint Pre-trial Statement ("JPTS") Due: 7/8/2019
- Memoranda of Law Addressing Issues in JPTS Due: 7/8/2019
- Responsive Memoranda Due: 7/23/2019

GRANTED.
/s/ DAB
2/26/19

We thank the Court for its continued courtesies in this matter.

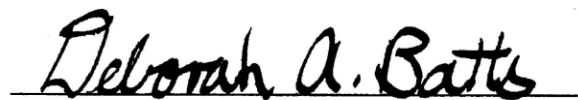
Respectfully yours,



David A. Stein

cc: Gerry Silver, Esq. (via ECF)

SO ORDERED



Deborah A. Batts
United States District Judge

2/26/19